

Executive Summary

Rockwell Automation (Rockwell) is a publicly-traded industrial automation solutions provider. Today, our company is a light-manufacturer of industrial automation components. Rockwell has a total of approximately 20,000 employees world-wide, with approximately 4,500 employees in Wisconsin.

Rockwell's significant environmental impacts are purchased electricity consumption and solid waste generation. In turn, Rockwell focuses its environmental efforts on:

- Energy usage reductions
- Solid waste reductions and solid waste deferred from landfill

In FY 2008, Rockwell (normalized to revenue) reduced the amount of:

- Purchased Electricity by 9%
- Liquefied fuels by 27%
- Solid waste generation by 6%

In FY 2009 (October 1 through September 31), Rockwell's corporate environmental metric goals are:

- Energy use (purchased electricity, natural gas, and liquid fuels) reduction of 3%, normalized to sales
- Solid waste deferral rate of 80% or higher

Currently, Rockwell has 32 sites certified to ISO 14001. Our Environmental Policy and a listing of our certified locations can be found at

http://www.rockwellautomation.com/about_us/envsafety/policy/envpolicy.html

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Environmental Performance

External Verification of Environmental Management System Performance

Of the Wisconsin locations, Milwaukee was audited in 2008. Milwaukee's audit report and corrective actions are attached in Appendix A. Please note that the DNV audit report also includes audit results for the Rockwell Chelmsford, MA and Manchester, NH facilities. These sites are outside the scope of the Green Tier program, but are tied to Milwaukee through our Corporate-wide Environmental Management System.

Update of Goals in Application Submitted in CY 2007: Ladysmith, Milwaukee, Mequon, and Richland Center

Objectives and Targets at each facility and the progress toward each Objective and Target since the submittal of Rockwell's Green Tier application in CY 2007, are listed in the tables shown below. Unless noted that a goal was initiated during 2008, goals listed in the application were continued into FY2008.

<i>Ladysmith Objectives and Targets Current Status</i>	<i>Progress</i>
<p>Objective:</p> <p>Reduce the amount of electricity used to operate the compressors that supply air to facility equipment by implementing an air leak detection program, monitoring usage, and repairing leaks in the system, thereby reducing the load on the compressors and their electrical usage.</p> <p>Target:</p> <p>Reduce electrical usage by 5% by the end of FY 07.</p>	<p>Began to track load information from compressor 1 and compressor 2 on February 3rd, 2006.</p> <p>Charted the compressor load hours to establish trends.</p> <p>Maintenance surveyed facility for air leaks on Saturday, February 11th and identified 50 minor air leaks and one major leak from the main 3" supply line.</p> <p>Fixed identified leaks.</p> <p>Reduced weekend load by 13 hours on main air compressor.</p> <p>Saved \$1800 per year on electricity by fixing the leaks in the line and reducing load on weekends</p> <p>Replaced existing RoboDrains (valve that opens to blow-down water out of the compressed air line) with new RoboDrains. Blow-down based on usage rather than time, resulting in savings of \$2700.</p>

<i>Ladysmith Objectives and Targets Current Status</i>	<i>Progress</i>
	<p>A reduction of 6.2% of total kWh usage in FY06 was achieved.</p> <p>Completed in June 2007.</p>
<p>Objective:</p> <p>Reduce hazardous waste generated from potting process.</p> <p>Target:</p> <p>Reduce hazardous waste generation of epoxies used in the potting process by 50% by the end of FY 07.</p>	<p>Reductions in hazardous waste were achieved by using pre-measured, smaller containers of epoxies which reduced the generation of hazardous waste from the process.</p> <p>The facility achieved 50% reduction based on volume.</p> <p>Completed in November 2008.</p>
<p>Objective:</p> <p>Establish new baseline of electricity and water increases from transfer of injection molding presses from other locations to the Ladysmith facility.</p> <p>Target:</p> <p>Baseline estimate to be Completed in 2011.</p>	<p>Initiated in Spring 2008- Transfers continue.</p> <p>On-going.</p>
<p>Objective:</p> <p>Ladysmith facility will clean-up Doughty Road twice per year.</p> <p>Target: Clean up twice per year in the Spring and Fall.</p>	<p>May 12, 2007 and September 15, 2007</p> <p>May 17, 2008 and September 2008 event was cancelled due to road construction.</p> <p>May 30, 2009 Completed. August 1, 2009 event scheduled.</p> <p>On-going.</p>

<i>Mequon Objectives and Targets Current Status</i>	<i>Progress</i>
Objective: Reduce the quantity of leaded solder dross used on site. Target: Reduce the quantity of leaded solder used by 10% vs. CY05 average.	At this time, the change over to lead-free boards in older product lines is on-hold. This process will be reviewed by business management in the future to determine if a business justification could be obtained. This objective and target has since been eliminated, awaiting business justification.
Objective: Reduce the quantity of leaded solder used on site. Target: Reduce the quantity of leaded solder used by 25% vs. CY05 average.	The solder dross reduction is directly tied to the goal shown above. This project is also on hold. This objective and target has since been eliminated, current no business justification.
Objective: Reduce the quantity of electrical energy consumed per month by the department parts dryer vs. FY05 average. Target: Complete parts dryer project by end of FY06.	The total hours saved per month will be 382 vs. the 24/7 operation at the start of the project. The kwhs to run the dryer have been calculated at 15.8 kwh (33Ax480V=15820W). Total kwh saved per month due to reduced operation is 6035 kwh (15.8 kwh x 382 hours). Total monthly savings at the time of the timer installation due to reduced operation is \$423 (\$0.07 x 6035). Current savings per month are \$482 due to \$0.08/kwh charge. Completed in April 2009.
Objective: Reduce the quantity of water consumed per month by installing a parts washing machine vs. FY05 average. Target: Complete parts dryer project by end of FY06.	A new automatic part washer was installed in November 2006. Savings: Daily water savings equates to 187.3 gallons per day. Completed in June 2009.
Objective: Reduce the quantity of natural gas consumed per month by installing a parts washing machine vs. FY05 average. Target: Complete parts dryer project by end of FY06.	This goal is tied to the reduction of water goal, shown above, as the natural gas is used to evaporate the waste water from the parts washer. Savings: Daily natural gas savings of 15,575 cft . Completed in June 2009.
Objective: Reduce the quantity of electricity consumed per year by taping the two 50 HP compressor into a lead/lag process. Target: Complete the project by March 2007.	The tapping system is estimated to provide an annual cost savings of \$14,723 in electrical energy reduction (210,328 kWh). Completed in February 2007.
Objective: Reduce the quantity of plastic material going into land fill by recycling the Avex Matrix Trays. Target: Complete by June 2007.	Full boxes shipped to Aventura average 5 per month at 47 lbs. (235 lbs/month, 2820 lbs/year). Completed in June 2007.

<i>Mequon Objectives and Targets Current Status</i>	<i>Progress</i>
<p>Objective: Reduce the quantity of plastic packaging material going into land fills by developing a recycling program.</p> <p>Target: Complete by FY2008.</p>	<p>Developed a recycling program.</p> <p>Tracking has shown an average of 4.5 gaylord bins of stretch wrap are shipped each week. The average weight of the plastic recycled each week is 313 lbs, reducing the total plastic placed in a landfill by 15,650 lbs a year.</p> <p>Completed in January 2008.</p>
<p>Objective: Eliminate hazardous waste disposal of leaded wipes in the Board Shop.</p> <p>Target: Complete by September 2009.</p>	<p>Initiated in September 08.</p> <p>On-going.</p>

<i>Milwaukee Objectives and Targets Current Status</i>	<i>Progress</i>
<p>Objective: Investigate the feasibility of evaporating aqueous holding tank wastewater and/or wastewater discharged to MMSD.</p> <p>Target: December 2007.</p>	<p>Objective was closed after feasibility study on 12/1/2007. The years for payback to install the evaporator was over 7 years at the current water rate. Additional reduction in waste water generation due to reduction in the production would increase the payback period.</p> <p>Completed in December 2007.</p>
<p>Objective: Investigate the feasibility of reducing energy usage in the factory building through the installation of occupancy lighting controls.</p> <p>Target: December 2007</p>	<p>Installation of factory building occupancy lighting controls was completed on 9/1/2007. Energy savings for the project were 1,468,641 kWh or \$108,810 per year.</p> <p>Several areas within the Milwaukee complex were upgraded to CFL style lamps. Areas currently unoccupied were identified and lighting minimized in those areas. Auto on/off switches were upgraded to turn on only when personnel are present.</p> <p>Completed in September 2007.</p>
<p>Objective: Implement a reusable mug program with the goal of reducing Styrofoam cup purchases in the cafeteria.</p> <p>Target: Reduce Styrofoam cup purchases by 5% as compared to FY07 monthly average by September 2009.</p>	<p>The cafeteria began offering (for purchase) a reusable mug with discounts on future purchases (refills) in April 2008.</p> <p>Current Status: Provide RA logo hot/cold mugs and refills at price and eliminate the free cups at the H2O Station. RA logo for mug has been developed and mug design is currently being chosen.</p> <p>On-going.</p>

<i>Milwaukee Objectives and Targets Current Status</i>	<i>Progress</i>
Objective: Investigate the feasibility of reducing energy usage in the Milwaukee campus by eliminating or replacing personal heaters with an alternative more energy efficient heater. Target: If feasible implement by September 2008.	On-going.
Objective: Investigate the feasibility of reducing energy usage throughout the Milwaukee campus by installing occupancy lighting controls and energy efficient fixtures. Target: If feasible implement by September 2008.	Data center and high-current lab lighting installed in high-current lab, for a calculated savings of 294,000 kwh or \$19,394 per year. Feasibility for expanding use for stairwells continues. On-going.
Objective: Remove transformer from service to eliminate no-load energy losses. Target: Complete by August 2008.	Completed in November 2007.
Objective: Prove concept for a new experimental retrofit of 250W HID fixtures to fluorescent to reduce energy consumption. Target: If the concept is proven, implement the new fixtures by September 2009.	Test lamps installed and shown to be effective as of June 2008. Project on-hold.
Objective: Replace & consolidate HVAC systems serving the gymnasium, reading room, exercise room, and adjacent cafeteria area. Target: Complete by September 2008.	Completed in December 2008.
Objective: Determine the feasibility of removing and replacing Tritium exit signs with an alternative style exit sign Target: If feasible, replace by June 2008.	Completed in July 2008.

<i>Richland Center Objectives and Targets Current Status</i>	<i>Progress</i>
Objective: Eliminate hazardous waste from painting operation Target: Eliminate hazardous waste by replacing current paint system with powder coat paint by end of FY2007.	The powder coat paint line has not yet been purchased. Waiting for business justification. On-going.
Objective: Eliminate non-hazardous waste [sludge] generated by the paint operation	The powder coat paint line has not yet been purchased. Waiting for business justification.

<i>Richland Center Objectives and Targets Current Status</i>	<i>Progress</i>
Target: Eliminate non-hazardous waste [paint sludge/water] by end of FY 2007 by replacing existing paint system with a powder coat system.	On-going.
Objective: Participate in community environmental activity	Participated in the Richland County Environmental Clean Sweep.
Target: Participate in the Richland County Environmental Clean Sweep activities annually.	On-going. Participate every year.
Objective: Organize facility environmental stewardship activity	Organized tree give away and planting activity with 15% employee participation.
Target: Organize facility environmental stewardship activity for Earth Day. Obtain 15% employee participation.	On-going. Annual event.
Objective: Install more efficient fluorescent lighting in the lower manufacturing area	The facility replaced approximately 40 fluorescent lighting fixtures with high efficiency low-mercury fluorescent lights. According to utility bills, the 10% reduction goal was met.
Target: Reduce electrical consumption of lighting fixtures by 10% by retrofitting old fluorescent fixtures to high efficiency, low mercury fluorescent fixtures by 06/30/08.	Completed in June 2008.
Objective: Use recycled paper to print the Centerline newsletter.	Initiated in March 2008.
Target: Print Centerline Newsletter with recycled paper and soy ink by June 30, 2008	Completed in April 2008.
Objective: Switch from liquid to foam soap to reduce the amount of soap used.	Initiated in July 2008.
Target: Switch from liquid to foam soap to reduce the amount of soap used by 09/30/08.	Completed in September 2008.

Current Fiscal Year Goals

Please see the FY 2009 Objectives and Targets for the Ladysmith, Mequon, Milwaukee, and Richland Center facilities, attached in Appendix B.

In addition, Rockwell Automation as a whole has established goals for FY2009:

- Reduce Energy Use by 3% (electricity, liquid fuels and natural gas), reduction normalized to sales year over year
- Reduce Solid Waste by 2 %, reduction normalized to FTE (full time equivalent) as compared to FY07 baseline
- Achieve Waste deferral of 80% or better
- Reduce Water Use by 1 % reduction, used normalized to FTE as compared to FY07 baseline
- Zero unpermitted releases that require reporting to a government agency

Transportation

Rockwell is a member of EPA's Smart Way program. This program assists us in tracking our carbon footprint relating to the transportation of our product within the United States, via ground transportation. Additionally, CO₂ emissions are calculated from employee business air miles.

The Mequon and Milwaukee locations have a ride-share program, which uses our company intra-net site to match employees looking for carpool partners. There are approximately 120 employees participating. As an incentive, active participants are put in a lottery, and each month there is a random winner of a \$50.00 gas gift card.

Communications and Employee Involvement

In 2008, Rockwell initiated a series of Sustainability Learning Hours for our employees, the topics of the Learning Hours have been:

- What is Sustainability and What Does Rockwell have to Offer?
- How is Rockwell Performing on its own Sustainability Metrics?
- Green- to-Gold or How Smart Companies Use Environmental Strategy to Innovate, Create Value, and Build Competitive Advantage
- Our Competition and Sustainability: Internal Performance, External Offerings
- Pavilion Overview: Energy Savings, Emissions Monitoring
- RA's Sustainability Portfolio: Energy, Environment, and Safety
- What is LEED?
- Information Solutions for Sustainable Manufacturing
- ProsCon Solution Delivery
- Biofuels
- Energy Monitoring and Reporting: Current Portfolio, Future Direction
- What is ISO 14001?
- Selected Sustainability Research Areas

Rockwell's employees have implemented an employee-based Sustainability Task Force. The employee-led group is soliciting fellow employees for ideas, "Ideas that affect just a small amount of our workforce

or the entire global population are welcome. No idea is too big or small.” One successful outgrowth from this team is the Milwaukee/Mequon rideshare program.

The Milwaukee facility cafeteria is looking for ways to become more sustainable. They are recycling the used cafeteria deep fryer oil for fuel use. Extra, fresh food is donated to those in need and food waste scraps are donated to be used as compost at an urban farm project. Summer of 2009, the Milwaukee facility invited Growing Power, a non-profit growing organic foods, to set up a weekly Farmer’s Market in the parking lot for employees to purchase fresh, local foods.

Conclusion

Rockwell is committed to sustainability, whether through the conservation of energy and resources in our production processes; addressing issues such as workplace safety, product safety and reliability; or introducing automation solutions that help our customers become less wasteful and more efficient in their own production processes. However, it takes more than top-down effort to drive a sustainable mindset and corresponding behaviors across our company. It takes all of our 20,000 employees across the world becoming part of the solution.

Rockwell’s Corporate Annual Report is included in Appendix C. This report highlights Rockwell’s environmental accomplishments for FY 2008 and demonstrates one of the methods of communication Rockwell uses for Stakeholder Involvement.

Appendix A: Det Norske Veritas Audit Report for Milwaukee Site and Corrective Action Documentation

*Rockwell Automation/Manchester, NH/
Chelmsford, MA/Milwaukee, WI*

Re-Certification Audit Report

Management System Certification

Standard: ISO 14001:2004

Project No.: 59-02200

Audit Dates: June 3 - 26, 2008

Street Address: 460 Elm St. Manchester, NH 03102,
2 Executive Dr, Chelmsford, Ma 01824,
1201 South 2nd Street, Milwaukee, WI 53204

City, State, Zip:

DNV Team Lead: Richard Demboski

Audit Team:



MANAGING RISK

Rockwell Automation/Manchester, NH/ *Chelmsford, MA/Milwaukee, WI*

Overall Summary

Below are some key points observed during the audit not included in the Focus Areas.

Positive Indications

- The management of training requirements and recordkeeping at Manchester was notable.
- The housekeeping at the Manchester site was notable.
- Chelmsford had a Housekeeping Day that resulted in over 12,000 pounds of waste being collected for recycle which was a notable activity.
- Interviews with employees at both Manchester, Chelmsford and Milwaukee demonstrated that they had an excellent understanding of the Environmental Policy and their roles and responsibilities.
- At Chelmsford, the design and development process involved environmental considerations from start to manufacturing and customer use and was now in the beginning stages to evaluate end of life environmental issues .
- The Milwaukee ISO 14001 Environmental Objective and



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Target Action Plan form is a Best in Practice for managing site objectives and targets.

- ▼ The use of pictorials in the Milwaukee Utility Control Manual was an excellent communication tool in this application.
- ▼ The Single-Stream Recycling program is a very effective recycling program at Milwaukee.

Main Areas for Improvement

- ▼ The Manchester site was not managing the universal waste as required. Four containers of used light bulbs were stored in the storage area and one in a side hall in the basement that were not labeled with the start date of accumulation.
- ▼ The training records for the Milwaukee Safety and Environmental Awareness Training required for 2007 were reviewed. Out of 2700 employees, 3.6%(96) employees were still deficient of the training over 17 months later. Of these, 47%(46) were supervised by 3 managers/supervisors.
- ▼ A review of SPCC Plan at Milwaukee required inspection records. Records were found back to the beginning of

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2007 but there was no objective evidence of inspection records for 2005 and 2006, as required.

Manchester has a Industrial Water Discharge permit for non-contact water. The only ongoing requirement was not to exceed 500 gpd of discharge. The site had not been monitoring or recording discharge volumes to verify that the requirement was not exceeded. Consider putting in place a system to periodically monitor and record discharge volume. Also, consider training 2 or more employees on the cooling water system and the blowdown requirements.

In Manchester, at the Safety Mat Dept., leads were soldered onto the mat assembly at a work table. The solder was dripping onto the floor. Drippage was cleaned up at end of shift and properly disposed. Consider a method of containing the drippage.

Review of Corporate Form 36-05A, dated 6/07 did not have 1) A space for the site Name, 2) A space for the date of the report. Consider adding this to the form.

The Procedure RA 900-31-07, Environmental Release Procedure in Section 8.3 stated the Environmental Coordinator must list materials reporting requirements and

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reporting thresholds and agencies in the Site Contingency Plan as per RA 900-49-50, Emergency Response Procedure requirements. Review of RA 900-49-50 requirements are not as prescriptive as RA 900-31-07. Consider review of both documents and standardize the issue.



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Management System Compliance Status

- ☒ This management system audit was performed in order to determine the degree of conformity and effectiveness of the system against the declared certification criteria.
- ☐ The report may contain nonconformities (NCs) that must be corrected before conformance to referenced documents can be confirmed and a certificate issued. There may also be a number of comments to complement noteworthy efforts and to outline improvement opportunities. This report may be modified by DNV as a consequence of verification activities carried out by the DNV Certification Unit. If this occurs, the report will be revised and re-distributed with explanations.
- ☒ The open nonconformities from the previous audit have been evaluated and found to be corrected with the agreed corrective action measures adequately implemented. "Open" NCs have been "Closed".
- ☐ Some nonconformities from previous audits remain open due to incomplete / unsatisfactory implementation of corrective action measures. Further details are contained in this report.
- ☐ The results of the Periodic Audit are such that the certification of the Management System **will** be continued.

Auditor Statements

- ☒ All findings were agreed with Management as being a true record of the facts observed.
- ☒ The actions taken in respect of the nonconformities identified at the previous audit were reviewed and were found to be effective in dealing with the issues raised. As such, all previous nonconformities are now closed.

Rockwell Automation/Manchester, NH/ *Chelmsford, MA/Milwaukee, WI*

- ☒ The nonconformities raised by this audit must have effective corrective actions implemented within the timescale identified in the Audit Findings Log. Verification of the effectiveness of the actions taken will be performed at the next audit.
- ☒ All clauses identified in the audit plan and programmes were assessed. Except as indicated in the "Audit Findings Log", the management system was found to be in compliance with the standard and the company's procedures.
- ☒ A sampling strategy was used during the audit. Based on this methodology, the fact that nonconformities were not identified does not mean that they do not exist in audited and/or other areas.
- ☒ Management Reviews, Internal audits, preventive & corrective actions were found to be implemented in accordance with the requirements of the audit standard.
- ☐ Customer complaints are handled, followed-up and closed in accordance with established procedures.
- ☒ The management system documentation has been reviewed and found to be compliant with the standard.
- ☒ The management system documentation has been changed to reflect changes in the organization.
- ☒ Continual improvement of system performance objectives are monitored for their progress and completion.
- ☒ The effectiveness of corrective actions issued during internal audits and management reviews are followed up.
- ☒ The use of certification mark(s) is in accordance with requirements.



Rockwell Automation/Manchester, NH/ *Chelmsford, MA/Milwaukee, WI*

Organization and Accreditation Details

Organization Details

Company Address: 460 Elm St. Manchester, NH 03102, 1201 South 2nd Street, Milwaukee, WI 53204		2 Executive Dr, Chelmsford, Ma 01824,
City, State, Zip:		No. of Shifts: 3
Contact Person: JoEllen Rostad		No. of Employees per Shift : See table
Contact E-mail: jerostad@ra.rockwell.com		Client Purchase Order No.:
Phone: 414-382-3906		Fax: 414-382-2277
DNV Team Lead: Richard Demboski		Auditor E-Mail: rdemboski@columbus.rr.com



Rockwell Automation/Manchester, NH/ *Chelmsford, MA/Milwaukee, WI*

Accreditation Details

Accreditation Scheme/Approval Body: ANAB	Industry Code (EA / NACE): 19/13.3
Applicable Product Standards:	Statutory Regulatory Requirements: Federal, State and Local environmental and safety regulations and Rockwell Automation Corporate requirements.
Certification Scope: The Environmental and Occupational Health and Safety systems associated with the design, manufacture, distribution and service of automation components and systems.	
Claimed Permissible Exclusions:	
Certificate No.: 3747 & 1000	DNV Project No.: 59-02200
DNV Technical Review:	Technical Review Date:

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Certificate Issuance

<input checked="" type="checkbox"/>	By issuance of this report by the Lead Auditor, it is confirmed that the client will be recommended for certification when all nonconformities have been satisfactorily addressed. Final approval is at the sole discretion of independent personnel, based on a complete technical review.
<input type="checkbox"/>	New
<input type="checkbox"/>	Other (specify): For example: Changes to company name, division name, company address
<input type="checkbox"/>	Scope Extension (specify reason for scope extension audit):

For multi-site projects, the certificate covers the following sites:

Site	Address	City, State, Zip	No. of Shifts	Employees Per Shift	Main Activity(ies) (Ex.: Purchasing, Sales, Design, etc.)	Site Audited
*HO	1201 South 2nd Street	Milwaukee, WI 53204	1	2702 total	Manufacture of automation equipment and Headquarters	<input checked="" type="checkbox"/>
	720 Industrial Boulevard	Dublin, GA 31021	2	287 total	Manufacture & Assembly of printed circuit boards.	<input type="checkbox"/>
	460 Elm St..	Manchester, NH 03102	2	220/12	Manufacture of automation equipment	<input checked="" type="checkbox"/>
	2 Executive Dr	Chelmsford, MA 01824	1	110	Engineering, design and testing of automation equipment	X
		Shirley NY				

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***For multi-site projects indicate which site is the "central" location for the Management System. This site should be indicated as the HO (head office) and shall as a minimum be audited at least annually.**

Note: The applicable revision level of the client's manual is June 2008.

Rockwell Automation/Manchester, NH/ Chelmsford, MA/Milwaukee, WI

Audit Findings

Summary from the Audit

(Details of the NCs, Observations, Opportunities for Improvement, and Noteworthy Efforts will be found in the "List of Findings")

Total number of nonconformities (NCs) identified during this audit:	2
Total number of Major (Cat. 1) NCs:	0
Total number of Minor (Cat. 2) NCs:	2
Total number of Observations identified during this audit:	5
Total number of Positive Indications identified during this audit:	8
Total number of Main Areas for Improvement identified during this audit:	11
Total number of NCs closed from previous audit:	1
Total number of NCs escalated from previous audit:	0
Total number of NCs down-graded from previous audit:	0
Total number of NCs left opened from previous audit (justification):	0



Rockwell Automation/Manchester, NH/ *Chelmsford, MA/Milwaukee, WI*

Conclusion / Next Step

- ☒ The Team Leader confirmed with the Auditee / Organization at the Closing Meeting that the information contained in the "List of Findings" is factual.
- ☒ **Submit** all nonconformity responses to your Lead Auditor in a sufficient timeframe to allow implementation of your Corrective Action Plan by the agreed completion date. DNV will verify effective implementation of Corrective Actions for Minor NCs during the next scheduled visit or Follow-up audit.
- ☐ **Major nonconformities** require a **follow-up audit** by the Lead Auditor. During the follow-up audit, the focus will be on those processes/clauses that were the subject of the Major NC(s). Additional samples and areas within the clauses may be audited, in addition to verification of the specific corrective action. Note that Corrective Actions must be effectively **implemented** in order to close.
- ☒ Findings identified as nonconformities must be responded to by the Organization within 90 days from the last date of the audit. The response shall include the results of investigation into the cause of the nonconformity, corrective action taken and confirmation of effective implementation.
- ☐ Major nonconformities were identified during the audit. This necessitates (requires) a follow-up audit to be performed upon completion of effective implementation of corrective actions by the Organization. Recommendation for certification can be given only upon satisfactory completion of the follow-up audit.

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- ☒ All applicable clauses of the Standard were assessed and the Management System was found to be in compliance, except as where indicated in the 'Audit Findings' section of this report.
- ☒ Upon issuance of the certificate, the Organization has the right to use the agreed accreditation mark in association with the DNV logo as outlined in the conditions attached to the Management System Certificate.
- ☒ The findings of the audit take into consideration the adequacy of the Organization and their management system documentation. The findings are also supported by observations made by the Audit Team with respect to the maturity and effectiveness of the Management System.



Rockwell Automation/Manchester, NH/ *Chelmsford, MA/Milwaukee, WI*

Key Participants

Name of Participant	Position and/or Department
Eric Caproni	Safety Specialist
Suresh Nair	Mgr Engineering
Tom Neff	Safety Specialist
Richard Durail	Hr Manager
Scott Campbell	
Mirjana Kotarac	
Yolanda Cunningham	
Jim Bustead	
George Murray	Facility Manager
Mike Guillemett	Env Tech Analyst
Scott Quello	Safety/Env Analyst
Maria Robinson	Mgr, EHS
Brett Jorgensen	Env Tech Analyst
Mike Pielowski	HQ EHS
JoEllen Rostad	

Note:

The above list contains only the primary contacts involved during the audit and is not an all-inclusive list of those individuals interviewed.



Rockwell Automation/Manchester, NH/ *Chelmsford, MA/Milwaukee, WI*

Special Notes

Statement of Confidentiality

The contents of this Report, including any notes and checklists completed during the Audit, will be treated in strictest confidence and will not be disclosed to any third party without written consent of the customer, except as required by the appropriate Accreditation Authorities or as otherwise outlined in the formal Certification agreement.

Explanatory Notes

This report may describe findings to be corrected before Certification to the referenced Standard(s) can be granted/continued. There may also be a number of comments to complement noteworthy efforts and to outline improvement opportunities. The report could be modified by DNV as a consequence of activities (verification of open issues or technical review) carried out by the DNV certification unit after the audit. If this occurs the report will be revised and re-distributed with explanations.

Distribution

This report will be sent to:

- 1) *Organization's Contact Person, by e-advantage, electronic copy or hardcopy, as agreed with the Organization*
- 2) *DNV Technical Review, as/if required by the DNV process*
- 3) *Electronic copy to be kept in DNV database*

Appendices

- | | |
|---|--|
| <input checked="" type="checkbox"/> Audit Program (Agenda) | <input checked="" type="checkbox"/> List of Findings |
| <input checked="" type="checkbox"/> Periodic Audit Plan / Audit Activity Matrix | <input type="checkbox"/> Re-Certification Plan |
| <input type="checkbox"/> Other Appendices | |

[Main Menu] [Search Audit Comments]

Edit Audit Comments For MILWAUKEE, WI

Audit Facility: MILWAUKEE, WI**Fiscal Year:** FY2008**Audit Type:** ISO 14001:2004**Audit Start Date:** 06/24/2008**Group Coordinator:** JOELLEN ROSTAD**Agency Close Date:****Facility Comments**

What is the impact to the facility? How do you know that the problem does (or doesn't) exist at your location? How did you check? Where are the records? How else may this impact your location (not just this exact issue)? What are you doing to prevent it from happening (even if it's not a problem now) - what systems, process, procedures are in place? How have you communicated the issue to those that may be affected? Include what has been done, not just what will be done.

Result	Clause	Agency Desc	Coord Comments
NCN Category 2	4.4.2	Milwaukee had identified training requirements and had the programs to train but not all of required employees had received the Safety and Environmental Awareness Training. The training records for the Milwaukee Environmental Awareness Training required for 2007 were reviewed. Out of 2700 employees, 3.6%(96) employees were still deficient of the training over 17 months later. Of these, 47%(46) were supervised by 3 managers/supervisors.	Periodically conduct a gap analysis on training records to ensure that all applicable employees receive their required training. Identified gaps will be addressed and the training will be scheduled and completed as soon as possible. Address technical issues, such as non-facility employees shown in your system as requiring training. Escalate communication to management regarding supervisors that are non-compliant in providing/enforcing required training for their employees. Refer to 900-49-10 Safety and Environmental Training.

The Milwaukee facility will perform a quarterly gap analysis for training deficiencies. The gap analysis has been added to the safety and environmental master schedule. Future training deficiencies will be escalated to employee supervisors and managers until the training is complete.

☐ Not
☐ App
☒ App

Apply 1
☐ Yes
☒ No

Spell Check

Edit

Cancel

Appendix B: FY 2009 Objectives and Targets for the Ladysmith, Mequon, Milwaukee, and Richland Center facilities

Objectives and Targets – Ladysmith FY 09

Activity	Aspect	Objective	Target	Responsibility/ Review Freq.	Action Plan/Milestones	Accomplishment Status
Injection Molding Category: 2,4	Air Emissions	Verify and chart the baseline of the air emissions (VOC's) of the molding plastics through the press vents.	(T1) Obtain the emissions factor for resin molding operations	George Jerome -	(T1) Contact Milwaukee facility to verify emission factor by 11-15-2008	(T1) Completed 11-13-2008
		Tracking to determine if reduction(s) are possible.	(T1A) Add this information to a spreadsheet and chart usage every quarter to calculate new usage based off from presses being added to Ladysmith	George Jerome to contact Jeff Lybert	(T1A) Create a chart for usage, gather usage report from Molding Eng. Support before 12-31-2008	(T1A) Chart created, action complete
			(T1B) Calculate past usage for 2007 & 2008 for annual usage as baseline	George Jerome	(T1B) Review usage reports for baseline and trends (on-going FY '09)	(T1B) On-going, trends are skewed based off from an "other than normal" production year

Objectives and Targets – Ladysmith FY 09

Activity	Aspect	Objective	Target	Responsibility/ Review Freq.	Action Plans/Milestones	Accomplishment Status
Injection Molding Category:1,3,4	Non Haz-Waste	Convert to a different sprue recycler because current recycler will no longer take due to a soft commodity market. These will be headed for the landfill if another vendor is not found. Our goal is to recycle 75% of FY '08 numbers.	(T2) Identify a vendor and sources for collecting and / or recycling sprues or using regrind from our Mold cell	(T2) George Jerome / Bruce Bejin	(T2) Identify potential recycler(s) to take this material to avoid it being land-filled while market is soft	(T2) 5R processors to take a load for evaluation on 12-16-08
			(T2A) Identify potential uses for our regrind of sprues if outsourced	(T2A) George & Bruce B.	(T2A) Meet with Bruce on 12-19-08 to create a list and see if we can take it back for re-use or make available for resale.	(T2A) Met with Bruce and will continue to work with new Process Engineer (Rick Kornely) but it currently looks like we will only be doing regrind as a closed – loop process in Ladysmith. We are going to make some golf tees, divot repair tools and coasters off from some Valox mixed regrind. (T2B)
			(T2B) Identify an additional outside source to take regrind material	(T2B) Paul Biever, changed to Rick Kornely and to be further evaluated	(T2B) Provide a contact to EHSS Coord. Before 1/31/09, revised to 6/30/2009	

Objectives and Targets – Ladysmith FY 09

Activity	Aspect	Objective	Target	Responsibility/ Review Freq.	Action Plan/Milestones	Accomplishment Status
Community Involvement (Not ranked as significant) Category: 1, 9	Views of Interested Parties	Continue to act in the interest of the communities in which we live and work	Set FY '09 schedule	George Jerome Review as required by plan	(T4A) Schedule 2 dates for Doughty Road cleanup by Janauray 2009.	(T4A) May 30, 2009 August 1, 2009
					(T4B) Encourage recycling with softer commodity market	(T4B) Working with 5R to try and continue to recycle things where there is not a current market
					(T4C) Recycle spent printer cartridges by donating them to Funding Factory	(T4C) Dan Burki continues to collect and ship these to the Funding Factory for local school points.
					(T4D) Participate in Annual Ladysmith Earth Day Event	(T4D) Assisted with planning.
					(T4E) Participate in Clean Sweep 8/2009. Seek volunteers for this.	(T4E) August 2009

Objectives and Targets – Ladysmith FY 09

Activity	Aspect	Objective	Target	Responsibility/ Review Freq.	Action Plan/Milestones	Accomplishment Status
3% Energy Reduction Category: 3,4	Expansion continues in 2009.	Identify list of potential projects and select those which can help us to achieve this level.	Complete a Feasibility study of these projects for FY 2010.	Engineering , Plant Mgr. ,Maint. & EHSS	(T5A) Create List of Potential Projects based off from input by 6/01/2009 (T5B) Perform cost feasibility and timeframe of each of those projects by 9/30/2009	

Category:

- 1) Pollution Prevention
- 2) Compliance to Legal and Other Requirements
- 3) Continual Improvement
- 4) Significant environmental aspects
- 5) Technological options
- 6) Financial requirements
- 7) Operational requirements
- 8) Business requirements
- 9) Views of interested parties

Facility Name Rockwell Automation - Ladysmith

Fiscal Year 2009

Approved by: Teri Blumenthal

Title: Plant Manager

Management Rep. George R. Jerome

Environmental Objectives and Targets

Facility Name: Rockwell Automation, Milwaukee, WI

Fiscal Year FY 2009

Approved by: Robert Neese

Title: Environmental and Safety Manager

Environmental Management Rep.

Robert Neese

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- Category:
- 1) Pollution Prevention
 - 2) Compliance to Legal and Other Requirements
 - 3) Continual Improvement
 - 4) Significant environmental aspects
 - 5) Technological options
 - 6) Financial requirements
 - 7) Operational requirements
 - 8) Business requirements
 - 9) Views of interested parties

N=New
C=Continuous

Category/ New or Continuous	Objective	Target	Responsibility (Responsible Personnel)	Action Plan/Milestones	Accomplishment Status (with date(s))	Facility Manager Review Date (if applicable)
C	Implement a reusable mug program with the goal of reducing Styrofoam cup purchases in the cafeteria by 5% as compared to FY07 monthly average purchases by 9/30/08.	1.) Investigate reusable mug program by 2/1/08. 2.) Establish financial feasibility by 3/1/08. 3.) Complete implementation by 5/1/08. 4.) Track reduction results by 9/30/08.	H. Petrakis C. Price B. Thornton R. Neese	See Action Plan	See Action Plan	12/15/2009
C	Investigate the feasibility of reducing energy usage in the Milwaukee campus by eliminating or replacing personal heaters with an alternative more energy efficient heater, if feasible implement by 9/30/09.	1.) Meet with project team to discuss opportunity by 3/1/08. 2.) Assemble PowerPoint presentation and background details by 7/1/09. 3.) Present to various members of upper mgmt. by 7/15/09. 4.) (If proceeding) Communicate plans to campus via various media by 8/1/09. 5.) Complete implementation of new policy by 9/30/08.	J. Kenney G. Marciniak S. Garland B. Jorgensen R. Neese	See Action Plan	See Action Plan	12/15/2009
C	Prove concept for a new experimental retrofit of 250W HID fixtures to fluorescent to reduce energy consumption. If concept is proven, implement new fixtures by 9/1/09.	1.) Test retrofit method, verify light output by 6/30/08. 2.) Place lamps on order by 6/30/08. 3.) Install test lamps by 7/15/08. 4.) Confirm if any premature failures, whether to pursue full implementation by 3/31/09. 5.) Decide scope of implementation and funding source by 5/1/09. 6.) Complete implementation by 9/1/09.	S. Garland J. Kenney R. Neese	See Action Plan	See Action Plan	12/15/2009
N	Eliminate the need for the MMSD waste water permit by transferring the Phosphate machine out of the plant by 7/31/2009.	1.) Determine feasibility of machine move including adequate locations (1/1/08). 2.) Review move options with operations management and obtain approval (1/1/08). 3.) Review environmental impacts with new location (5/30/09). 4.) Shut down machine operation and begin dismantle (6/1/09). 5.) Remove machine from facility (6/12/09). 6.) Assist new location in set-up of new machine (7/1/09). 7.) Formalize letter to MMSD requesting the elimination of the permit (8/1/09).	R. Uhrich S. Kania R. Neese	See Action Plan	See Action Plan	5/1/2009
N	Determine feasibility of bringing 5th Building 42 office and conference rooms lights into Lutron system by 9/30/2009.	1.) Initiate project lead (6/1/09) 2.) Determine total number of affected fixtures (7/15/09). 3.) Determine fixture implementation costs (7/15/09) 4.) Determine energy cost savings and payback period. 5.) If desired payback is obtained, submit PAR for approval (7/30/09)	S. Garland J. Kenney R. Neese	See Action Plan	See Action Plan	NA

**Rockwell
Automation**

ACTION PLAN

TARGET:

OBJECTIVE:

PROJECT TEAM:

R. Uhlrich, S. Kania, R. Neese

BACKGROUND:

The Milwaukee facility is required to operate under a waste water permit with MMSD due to the categorical standard including the phosphating machine. This machine does not discharge and sampling at outfall shows discharge levels are below permit limits, but the existence of the machine requires the permit. RA aspect and impact procedures require the need for a permit as a significant impact item. The removal of the machine will allow the removal of the permit and reduce the overall impact for the facility.

PROJECT DEFINITION:

Shut down and move the existing D280 Phosphating machine and relocate the operations at a non-Rockwell Automation owned facility. Provide transfer, set-up, environmental impact, and operations support through the time of the machine transfer. Formalize permit removal process with MMSD.

METRICS: TYPE, SOURCE AND/OR CALIBRATION ISSUES:

Elimination of the machine operation in the plant and removal of MMSD Waste Water Permit.

MILESTONE/PLAN: *(plan is subject to change, see status)*

	PLAN	REV.	COMP.
Determine feasibility of machine move			11/1/08
Review move options and obtain approval from management			11/1/08
Review environmental impact and permit requirements with new location	5/30/09		5/1/09
Shut down machine and begin to dismantle	6/1/09		
Transfer machine to new location	6/12/09		
Assist in set-up and proper operation	7/1/09		
Submit formal request to remove MMSD permit	8/1/09		

PROJECT STATUS:

5/19/2009

The Phosphator has been approved for a transfer to an Orchid facility in November 2008. Steve Kania has worked with Orchid and the operations team to ensure proper operation is achieved at the transfer facility and that all env. impact and permit issues are resolved. In April 2009 a new oil heat system was added to the Phosphator while in the MKE facility to ensure proper operation (Orchid does not have the ability for steam heat). Final approval for the move was obtained on 5/1/09 with the scheduled move to begin on 6/1/09.

Aspect/
Impact
Review

OTHER:

ACTION PLAN

TARGET:

Complete feasibility study of bringing the 5th Floor Building 42 office and conference room lights into the Lutron control system by 9/30/2009.

OBJECTIVE:

Resource Conservation; Reduce electrical energy consumption.

PROJECT TEAM:

S. Garland, J. Kenney, R. Neese

BACKGROUND:

Recent energy reduction projects have included the use of motion sensing controls or timed off periods throughout the complex. It was noted late in FY2009 the the office and cubical areas on the 5th floor of Building 42 have no controls. The building could see an energy reduction in bringing the lights into the Lutron control system.

PROJECT DEFINITION:

Complete a feasibility study of bringing the 5th floor lights into the Lutron system by calculating the project cost and cost savings to determine payback period.

METRICS: TYPE, SOURCE AND/OR CALIBRATION ISSUES:

Payback period must be less than 2.5-years to receive project approval.

MILESTONE/PLAN: *(plan is subject to change, see status)*

	PLAN	REV.	COMP.
Initiate project lead	6/1/09		
Determine total lighting components	6/15/09		
Calculate project installation costs	6/20/09		
Calculate energy reduction costs and determine payback	6/20/09		
If desired payback is achieved, submit PAR for approval	7/1/09		

PROJECT STATUS:

5/19/2009 Project initiated

Aspect/
Impact
Review

OTHER:

ACTION PLAN

TARGET:

Investigate the feasibility of reducing energy usage in the Milwaukee campus through the elimination or replacement of the current 1500W personal heaters, if feasible implement by 9/30/08 9/30/2009.

OBJECTIVE:

Resource Conservation; Reduce electrical energy consumption.

PROJECT TEAM:

J. Kenney, S. Garland, G. Marciniak, B. Jorgensen, S. Quelle Robert Neese

BACKGROUND:

Electric heaters consume a huge amount of electricity in the Mke campus by themselves, plus the bldg. systems spend additional energy re-tempering air to meet the thermostat's demands. Electric heat is also a very costly form of energy in comparison to steam. Ideas to change policies has been tossed around over the years, however quickly fizzled out without the buy-in from upper mgmt. Mequon has never allowed heaters at their campus, MyHts allows the 400W model only.

PROJECT DEFINITION:

Propose alternatives to the 1500W personal heaters that are issued by the crib. Suggestions include changing to new 400W model, or preferred, eliminating heaters entirely at the Milwaukee campus. Calculate savings opportunity on both reducing or eliminating heater use in the building. Lead presentations to various upper mgmt. staff to gain acceptance and buy-in, suggesting banning them entirely. Communicate & implement the chosen alternative campus-wide.

METRICS: TYPE, SOURCE AND/OR CALIBRATION ISSUES:

Baseline energy use is calculated with assumptions based on the number of heaters on the floor and on old heater energy requirements. Energy savings will be calculated by number of alternative heaters on the floor x energy requirements.

MILESTONE/PLAN: *(plan is subject to change, see status)*

	PLAN	REV.	COMP.
Meet with project team to discuss opportunity, devise plan	2/1/08	~	1/15/08
Assemble powerpoint presentation and background details	4/1/08	7/1/09	
Present to various members of upper mgmt to decide which option to pursue	6/1/08	7/15/09	
(If proceeding) Communicate plans to campus via various media	8/1/09		
Complete implementation of new policy	9/30/09		

PROJECT STATUS:

As of: 1/15/08	Project team met and reached consensus on how to proceed. Brett to lead effort in presenting options to upper mgmt team. Conservatively, \$240K annual if heaters banned, \$185K annual if heaters replaced with 400W, \$55K annual if crib merely changes stock and 1500W no longer offered.
4/19/2008	Brett has completed the draft version of the presentation. He will have it in final form by 5/1/08. So I have revised the date on the plan accordingly.
6/12/2008	Brett indicated that he does not have the presentation in final form, but expects to have it ready by 7/1/08 and presented to upper mgmt. by 7/15/08. The milestones/plan section has been updated to reflect these changes. The remaining two milestones remain unchanged at this time.

12/15/2009	Management Review - Neese indicated that this objective had not been reviewed since the last meeting. Currently demoing the radiant heat 400W heater. Neese will review project and determine if still feasible
Aspect/ Impact Review	

OTHER:

ACTION PLAN

TARGET:

Implement a reusable mug program with the goal of reducing styrofoam cup purchases in the cafeteria by 5% as compared to FY07 FY08 monthly average purchases by 9/30/08 9/30/09.

OBJECTIVE:

Waste Minimization; Reduce styrofoam purchases and waste disposal to landfill.

PROJECT TEAM:

Heidi Petrakis, Cliff Price, Bill Thornton, Scott Quello, Robert Neese

BACKGROUND:

Styrofoam cups are used in the cafeteria for beverage consumption. The cafeteria purchases an estimated average of 10,000 cups each month for use in the cafeteria and take-out.

PROJECT DEFINITION:

The Milwaukee facility cafeteria will implement a reusable mug program for coffee and soda in an effort to reduce styrofoam cup usage and trash disposal. After the initial purchase of the mug all future refills will be discounted by \$0.10. Modification as of 12/15/2009: Change current Aramark mug to a RA logoed hot mug and RA logoed cold mug and provide at a discounted price. Also, eliminate free styrofoam cups at H2O station and charge \$0.25 for all styrofoam cups in order to diminish the total styrofoam cup usage

METRICS: TYPE, SOURCE AND/OR CALIBRATION ISSUES:

Track reduction by comparing current styrofoam cup purchases against FY07 FY08 monthly average styrofoam cup purchases.

MILESTONE/PLAN: *(plan is subject to change, see status)*

	PLAN	REV.	COMP.
Investigate reusable mug program	2/1/08	~	2/1/08
Establish financial feasibility	3/1/08	~	3/1/08
Complete implementation of Aramark Mug	5/1/08	~	4/25/08
Determine new FY08 styrofoam totals	5/30/09		
Pick new RA logoed hot and cold mugs	6/1/09		
Implement new mugs	7/1/09		
Track reduction results	9/30/08	9/30/09	

**STATUS
AS OF:**

2/1/08	Rockwell Automation and Aramark food services have teamed up to find a cost effective mug for the proposed reusable mug program.
3/1/08	Initial mug stock has been ordered.
4/25/08	The cafeteria began offering (for purchase) a reusable mug with discounts on future purchases (refills).
5/5/08	The new reusable mug program was communicated facility-wide on 5/1/08 through Clock Tower News and cups are available next to cafeteria registers for purchase.
6/20/08	Overall mug sales have been strong, but the point of sale records from the cash register are not correlating with mug sales. The actual purchases using the discount button are low. We may have to try a different marketing strategy to increase the numbers.

12/15/09	Management Review - showed that no additional action has been taken to increase sales or track total sales. Additionally, no FY2007 baseline was formalized. Objective updated to include new initiative in 2009 with hot and cold reusable mugs vs. FY2008 totals. Provide mugs and refills at price and eliminate the free cups at the H2O Station.
5/15/09	Hot and cold style mugs have been chosen and must be approved by Marty Thomas. RA logo for mugs has been chosen. Heidi to run cost basis to determine discounted price and go live date to be determined.
Aspect/ Impact Review	

OTHER:

* See Project Book

Milwaukee Facility

ACTION PLAN

TARGET:

Prove concept for a new experimental retrofit of 250W HID fixtures to fluorescent to reduce energy consumption. If concept is proven, implement new fixtures by 9/1/09.

OBJECTIVE:

Resource Conservation; Reduce electrical energy consumption.

PROJECT TEAM:

S. Garland, J. Kenney, S. Quello

BACKGROUND:

HID fixtures with standard ballasts are commonly replaced with new T8/T5 fluorescent technologies, however investment costs have been somewhat prohibitive in replacing these throughout the complex. Facilities Engineering has developed an experimental concept for retrofitting the fixtures in place with compact-style fluorescent lamps, longevity yet to be proven. Innovative concept has not been done by anyone else to our knowledge.

PROJECT DEFINITION:

An 85W compact fluorescent lamp is now available that proves a fairly comparable light output to that of our 250W HID's. Facilities has developed a method of retrofitting existing fixtures to install this lamp, however manufacturers are unwilling to warranty the longevity of the lamps in this application. A test case of 20-lamps is to be installed-- if deemed successful, retrofits are then to be done facility-wide (possible for 1,000+ fixtures).

METRICS: TYPE, SOURCE AND/OR CALIBRATION ISSUES:

Energy savings is calculated by comparing baseline energy usage against calculated energy usage after new lamps are installed. Some assumptions will be made on hours of operation.

MILESTONE/PLAN: *(plan is subject to change, see status)*

	PLAN	REV.	COMP.
Test retrofit method, verify light output	6/30/08		5/15/08
Place lamps on order (Qty 20) (Qty 3)	6/30/08		6/2/08
Install (20) (3) test lamps	7/15/08		7/12/08
Confirm if any premature failures, whether to pursue full implementation	3/31/09		12/15/09
Decide scope of implementation, funding source (if applicable)	5/1/09	7/1/09	
Complete implementation (if applicable)	9/1/09		

PROJECT STATUS:

As of 6/13/08	(3) test lamps installed-- installation concept proven & light levels deemed acceptable for most areas. (20) lamps placed on order, to be installed in July. Will monitor closely over 4 to 6 month time period to determine if any premature failures.
12/15/2009	The three lamps have proven to be adequate and effective with no failures over the preceeding 6-months. Annual cost savings of changing out fixtures equals \$8,085 and 131,030 kWh. Will determine implementaiton cost and submit PAR by 5/1/2009.
5/19/2009	Project on hold due to economic downturn. Will be reviewed again in Q4 of fiscal year.
Aspect/ Impact Review	

OTHER:

* See Project Book

Environmental Objectives and Targets

Facility Name Mequon, WI

Fiscal Year FY2009

Approved by: _____

Title: _____

Environmental Management Rep. Rob Neese

Page 1 of 1

N=New
C=Continuous

Category/ New or Continuous	Objective	Target	Responsibility (Responsible Personnel)	Action Plan/ Milestones	Accomplishment Status (with date(s))	Facility Manager Review Date (if applicable)
N	Waste Minimization, Recycling; Reduce trash disposal through recycling.	Investigate the feasibility of implementing a Single Stream recycling program to promote and increasing recycling throughout the Mequon campus by 9/30/09.	S. McCutcheon, S. Quello, D. Rybacki	See Action Plan	See Action Plan	12.18.09
N	Hazardous Waste Reduction	Eliminate hazardous waste disposal of leaded wipes in the Board Shop by 9/30/09.	S. Quello, R. Vandinter, M. Plechowski	See Action Plan	See Action Plan	12.18.09
C	Reduce the quantity of water consumed in the Remanufacturing Department.	Reduce the quantity of water consumed per month by installing a parts washing machine vs. FY05 average by 7/31/09.	G. Burant, S. Quello	See Action Plan	See Action Plan	12.18.09
C	Reduce the quantity of natural gas used in the Remanufacturing Department.	Reduce the quantity of natural gas consumed per month by installing a parts washing machine vs. FY05 average by 7/31/09.	G. Burant, S. Quello	See Action Plan	See Action Plan	12.18.09
C	Reduce the quantity of electronic scrap generated by the department by processing used UltraMotion Boards into repaired product.	Reduce the quantity of electronic scrap generated by the Remanufacturing Department by reusing circuit boards by 12/31/2007.	D. Mankiewicz, S. Quello	See Action Plan	See Action Plan	12.18.09
C				See Action Plan	See Action Plan	12.18.09

Mequon Facility

ACTION PLAN

TARGET:

Investigate the feasibility of implementing a Single Stream recycling program to promote and increasing recycling throughout the Mequon campus by 9/30/09.

OBJECTIVE:

Waste Minimization, Recycling; Reduce trash disposal through recycling.

PROJECT TEAM:

S. McCutcheon, S. Quello, Dave Rybacki

BACKGROUND:

The Mequon facility currently has a recycling program that uses a number of different containers to recycle various wastestreams. From time to time we try new things to refresh and communicate how important recycling is to Rockwell Automation. About a year ago we switched are recycling and trash vendor to Waste Management. We made a decision to keep segregating our waste because we were still receiving credits on our cardboard and paper streams. Due to negative changes in the economy, consumer commodity returns have been drastically reduced or even eliminated in most cases. We have decided to implement the new Single Stream recycling program that WM offers to try to capture a larger percentage of our recyclables by offering a program where ALL recyclables can be captured in a "Single" container make it a much easier and effective way to recycle.

PROJECT DEFINITION:

If feasible, implement the new recycling program throughout the entire Mequon campus.

METRICS: TYPE, SOURCE AND/OR CALIBRATION ISSUES:

Recycling rate will be calculated by comparing FY08 recycling baseline against recycling rates once the program has been effectively implemented.

MILESTONE/PLAN: *(plan is subject to change, see status)*

	PLAN	REV.	COMP.
Complete feasibility study by:	12/31/08	~	12/31/09
Decide labeling and communication strategy by:	4/1/09	~	30/30/09
Phase 1: new recycling program in office areas by:	5/1/09		In-process
Phase 2: new recycling program on manufacturing floor by:	6/1/09		In-process
Phase 3: new recycling program in common areas by:	7/1/09		
Track recycling rates and complete project by:	9/30/09		

**PROJECT
STATUS
AS OF:**

12/1/2008

Doug Lessila from Waste Management came in to review the current facility waste handling practices to look for recycling opportunities and options. Doug and I reviewed our current recycling program and the rate of return for a number of our streams. Based on the review of the wastestreams, lack of credit returns due to a down turn in commodity pricing, increased transportation costs, and costs occurred for leasing additional dumpsters for collecting "no value/non credit" items, it was apparent that at this time, it was in Rockwell's best interest to move forward with the implementation of the Single Stream program to encourage and promote recycling in this facility.

3/30/2009	Met with Facilities Dave Rybacki, Scott McCutcheon, Jerry Zaboklicki to discuss the Single Stream recycling program labels and discuss how they would be applied. The decision was made that for the office areas we are going to use the janitorial service Mahler to phase in the new trash and recycling labels to designate what is to be disposed in each office container. For the manufacturing floor EHS will work with the Dept. supervisors to communicate the new program, specify trash and recycling containers, label, and monitor. For the common areas we are waiting until the new HQ recycling label is finalized and released for use.
4/24/2009	Two articles went out in the Mequon newsletter April 16 th and 23 rd communicating the new Single Stream recycling initiative. The RA Corp recycling logo has been finalized. Labels have been received. They need to be printed and distributed by the janitorial service Mahler. We need to discontinue the 2 yard recycling dumpster in the North dock once the common area recycling containers have been implemented under the new program. The desk side trash and recycling labels are expected to be on all containers by 5/15/09.
Aspect/ Impact Review	

OTHER:

* See Project Book

ACTION PLAN

TARGET:

Eliminate hazardous waste disposal of leaded wipes in the Board Shop by 9/30/09.

OBJECTIVE:

Hazardous Waste Reduction

PROJECT TEAM:

S. Quello, R. Vandinter, Mike Piechowski

BACKGROUND:

The board shop collects contaminated wipes that must be shipped through Clean Harbors as Hazardous Waste. In calendar year 2008 they generated about 1,080 pounds that was shipped offsite as a D008 lead hazardous waste at a cost of \$2,139.00. As part of our quest for continual improvement we have contacted Sims Recycling (formerly United Recycling), the partner we use for electronic scrap, to conduct a walk thru of the Mequon facility. The purpose is to review the practices we have in place and to offer suggestions for potential improvement/ additional recycling streams.

PROJECT DEFINITION:

Hazardous waste leaded wipes generated in the Board Shop (D456).

METRICS: TYPE, SOURCE AND/OR CALIBRATION ISSUES:

Compare monthly average of hazardous leaded wipes sent for disposal in CY2008 against the monthly volume of leaded hazardous waste wipes sent after implementation of the new recycling loop.

MILESTONE/PLAN: *(plan is subject to change, see status)*

	PLAN	REV.	COMP.
Schedule walkthrough with SIMS recycling to review streams by	12/1/08	~	10/28/08
Review SIMS recycling options by	2/1/09	~	10/30/08
Implement new process, labeling, and dept. communication by	4/1/09	~	2/1/09
Track hazardous waste reduction and complete project by	9/30/09		

**PROJECT
STATUS
AS OF:**

10/28/2008	Martin Knight and Andrew Deluca from SIMS came in to complete a site walkthrough on 10/28/08. During the walkthrough SIMS reviewed a number of our waste streams to look for recycling opportunities.
10/30/2008	Martin Knight sent an email confirming the acceptance of lead contaminated rags, gloves, jars, and wipes from the D456 board shop to SIMS.
1/15/2009	The process for collection of Pb wipes, etc. will not change. The labels have been changed on the containers to a Controlled Material. Once the bags in the collection containers are full they will continue to be sent to the central waste storage area for disposition. From there we will put the bags in with our scrap electronics bins that are also shipped to SIMS for recycling/reclamation. This process change is expected to begin on 2/1/09.
4/24/2009	The new recycling implementation date was 2/1/09. We are monitoring the process for a few months to ensure full implementation and to track the reduction of hazardous waste leaded wipes.

Aspect/
Impact
Review

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OTHER:

* See Project Book

ACTION PLAN

TARGET:

Reduce the quantity of electronic scrap generated by the Remanufacturing Department by reusing circuit boards by 12/31/09.

OBJECTIVE:

Reduce the quantity of electronic scrap generated by the department by processing used Ultra/Motion Boards into repaired product

PROJECT TEAM:

Denise Mankiewicz, Scott Quello

BACKGROUND:

Denise is working toward her Green Belt and determined there is a lot of electronic equipment on returned product that could be reused. The largest dollar items are the circuit boards.

PROJECT DEFINITION:

Develop a process to remove circuit boards from damaged Ultra drives for reuse.

METRICS: TYPE, SOURCE AND/OR CALIBRATION ISSUES:

Track total number of reused boards verses previous reuse.

MILESTONE/PLAN: *(plan is subject to change, see status)*

Investigate feasibility of reusing circuit boards by
Investigate quantity of boards affected by reuse by
Develop procedure if feasible by
Implement procedure by
Document recycling quantities by

PLAN	REV.	COMP.
7/30/07	7/31/09	
7/30/07	7/31/09	
8/30/07	8/31/09	
9/30/07	9/30/09	
12/30/07	12/31/09	

STATUS:

3/1/2007	Project initiated.
7/3/2007	Minor action taken on the total number of Ultra and Motion drives available for reuse vs. scrapping. Denise plans on taking more action on this project within the next two months.
12/12/2007	Due to the decision to bring in 15,000 square feet of assembly equipment into the Mequon facility from the closing Westerville facility, this project has been placed on hold until Q3 of 2008.
11/27/2007	Reviewed during the Management Review held on 11/27/07.
6/1/2008	No progress, project on-hold until FY08Q3.
12/1/2008	Due to the decision to bring in 15,000 square feet of assembly equipment into the Mequon facility from the closing Westerville facility and the fact that the EHS Coordinator left the company in June 2008 and a new EHS coordinator was hired in Sept. 2008, this project has been placed on hold until Q3 of 2009. All dates on the milestone/plan have been revised to reflect the new target dates.
4/24/2009	No significant progress has been made. Denise Mankiewics is looking for a replacement to carry out this project due to a position change since this project was initiated. She expects the feasibility study to be on target for 7/31/09. Scott Quello is the new EHS coordinator who will manage these projects until complete.

Aspect and Impact Review	
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OTHER:

ACTION PLAN

TARGET:

Reduce the quantity of water consumed per month by installing a parts washing machine vs. FY05 average by
~~12/31/05 3/30/2007 5/1/2007~~ 7/31/09.

OBJECTIVE:

Reduce the quantity of water consumed in the Remanufacturing Department

PROJECT TEAM:

Gerry Burant, Scott Quello

BACKGROUND:

The parts washing area in the Remanufacturing Department is one of the largest consumers of water in the facility. It was determined that a work study would be performed to determine the current process and time associated with the process. The study indicated there was no formal work process to wash returned drives. John Fico was assigned the project to implement a formal wash process which included the potential to install an automated parts washing machine.

PROJECT DEFINITION:

Install an automatic parts washing machine in the Remanufacturing Department

METRICS: TYPE, SOURCE AND/OR CALIBRATION ISSUES:

Compare current water consumption to the consumption following the installation of the parts washer.

MILESTONE/PLAN: *(plan is subject to change, see status)*

	PLAN	REV.	COMP.
Determine current use/baseline by	6/1/05	~	5/20/05
Determine feasibility of parts washer by	7/1/05	~	7/1/05
Submit PAR to purchase parts washer by	6/1/05	12/15/05	12/6/05
Establish project installation plan by	4/1/06	2/15/06	2/15/06
Implement installation plan by	3/31/06	6/1/2006 10/1/2006	11/1/06
Document water use and compare to baseline for reduction by	4/15/06	6/15/2006 10/15/2006 3/30/2007 5/1/2007 7/31/09	

STATUS AS OF:

7/1/2005	John Fico has completed a work study of the parts washing area to determine the current wash process and wash time for each drive entering the facility. An additional study was completed on the time and efficiency of a parts washing machine to determine the potential benefits and payback time for the machine. It has been determined with the reduction of overhead costs, the payback time for the machine would be about 2.5 years. Additionally, John has documented the current monthly usage of the water in the wash process as a baseline for reduction tracking
7/10/2005	It has been determined that the 2.5 year payback would be feasible to purchase the machine, but with budgets frozen at this time, the PAR will not be submitted until FY2006.

1/16/2006	PAR was submitted on 12/6/05 and is still in the review process. Lead time on delivery after approval is 12 to 16 weeks. Currently developing installation plan.
6/1/2006	PAR approval was delayed due to budgeting issues for fiscal year. Final approval of PAR was not given until April 2006. With lead time of product, delivery and installation are planned for September 2006.
1/3/2007	Parts washer has been installed and in running mode as of November 2006. May washing issues have occurred including a scheduling, wash time, detergent change, how to clean small parts, drying time, and a distilled water rinse. At this time it appears that more is used during the wash process than when parts were washed by hand due to the constant run of the distilled water at approximately 5 gallons/minute. Gerry will review the need for the distilled water rinse and determine if the 5 gallon/minute rate is required. This as well as formalizing the total run time per minute should show if a water reduction has been achieved. We will review again in March 2007.
3/14/2007	In February 2007, Gerry changed the DI water pressure from 9 psi to 2 psi which has seemed to reduce the water discharged to the holding tank. Unfortunately there is no water flow indicator on the DI line so a calculation will need to be developed to indicate the amount of water used. Additionally, the production process is still in flux with the new wash machine. A Kaizen event will take place the week of 3/20/2007 to determine what the receiving/wash process will be. In turn this will indicate the production time for the washer, i.e. run time and shift use. Follow the final development of the production process, water use calculations will be completed.
7/10/2007	The production use of the wash machine will be limited to 1 hour of use per day typically with the option to run for additional hot jobs or other purposes. The wash machine will run on first shift. Additional operation of the hand wash sinks will continue to be an option on both shifts as well. This operation schedule will be used to determine if a water savings has been obtained with the new machine. Gerry will establish a tracking plan for water usage at the point of use in the department (meter includes sinks, wash machine, and DI water). Plan will be to have the metering done the week of 7/16. Additionally, the natural gas used to evaporate the water will also be metered for a reduction verification.
11/27/2007	Project status reviewed the facility Management Review held on 11/27/07.
6/1/2008	Due to the expansion of the Westerville repair center into Mequon this project is on-hold until the move is complete.
12/1/2008	No tracking progress on this project has been started. The plan is to wait until the entire transfer is complete. The transfer is not expected to be complete until FY09Q1. Scott Quello is the new EHS coordinator and will now manage this project to completion.
12/19/2008	Project status reviewed the facility Management Review held on 12/19/08.
4/24/2009	The Westerville transfer is complete. An initial calculation was attempted using the FY05 baseline information against the parts washer dump frequency, but the results were not feasible, so the plan is to begin tracking to show the water reduction for 2 months beginning May 15th through July 15th, with the intent to report and close the metric on 7/31/09. So the remaining steps to the closure of this project is: 1.) Get the average number of units washed for two months. 2.) Determine how often the wash water is changed out. 3.) Determine the total amount of DI water used per drive.

Aspect and
Impact
Review

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OTHER:

ACTION PLAN

TARGET:

Reduce the quantity of natural gas consumed per month by installing a parts washing machine vs. FY05 average by ~~12/31/05~~ ~~3/30/2007~~ ~~5/1/2007~~ 7/31/09.

OBJECTIVE:

Reduce the quantity of natural gas used in the Remanufacturing Department

PROJECT TEAM:

John Fico Gerry Burant

BACKGROUND:

The parts washing area in the Remanufacturing Department is one of the largest consumers of water in the facility. It was determined that a work study would be performed to determine the current process and time associated with the process. The study indicated there was no formal work process to wash returned drives. John Fico was assigned the project to implement a formal wash process which included the potential to install an automated parts washing machine. The parts washing machine will be more efficient in the use of water, which will reduce the amount evaporated. The evaporator should consume less natural gas due to the reduction in run time.

PROJECT DEFINITION:

Install an automatic parts washing machine in the Remanufacturing Department

METRICS: TYPE, SOURCE AND/OR CALIBRATION ISSUES:

Compare current natural gas usage to usage following the installation of the new machine.

MILESTONE/PLAN: *(plan is subject to change, see status)*

	PLAN	REV.	COMP.
Initiate project	4/1/05	~	4/1/05
Determine current use/baseline	6/1/05	~	5/20/05
Determine feasibility of parts washer	7/1/05	~	7/1/05
Submit PAR to purchase parts washer	6/1/05	12/15/05	12/6/05
Establish project installation plan	4/1/06	2/15/06	2/15/06
Implement plan	3/31/06	6/1/2006 10/1/2006	10/1/06
		6/15/2006 10/15/2006 3/30/2007 5/1/2007	
Document natural gas use and compare to baseline for reduction	4/15/06	7/31/09	

STATUS

AS OF:

7/1/2005	John Fico has completed a work study of the parts washing area to determine the current wash process and wash time for each drive entering the facility. An additional study was completed on the time and efficiency of a parts washing machine to determine the potential benefits and payback time for the machine. It has been determined with the reduction of overhead costs, the payback time for the machine would be about 2.5 years. Additionally, John has documented the current monthly usage of the natural gas in the wash process as a baseline for reduction tracking.
7/10/2005	It has been determined that the 2.5 year payback would be feasible to purchase the machine, but with budgets frozen at this time, the PAR will not be submitted until FY2006.

1/16/2006	PAR was submitted on 12/6/05 and is still in the review process. Lead time on delivery after approval is 12 to 16 weeks. Currently developing installation plan.
6/1/2006	PAR approval was delayed due to budgeting issues for fiscal year. Final approval of PAR was not given until April 2006. With lead time of product, delivery and installation are planned for September 2006.
1/30/2007	The natural gas usage is directly linked to the total water used in the parts washer. Many issues have lengthen the time needed to reduce the water usage with the wash process. When the water issues are addressed and we show a reduction in water, the baseline for natural gas will be reviewed to show whether the reduction occurred.
3/14/2007	The natural gas usage is directly linked to the total water used in the parts washer. Many issues have lengthen the time needed to reduce the water usage with the wash process. When the water issues are addressed and we show a reduction in water, the baseline for natural gas will be reviewed to show whether the reduction occurred.
7/10/2007	See water reduction objective for specifics.
11/27/2007	Project status reviewed the facility Management Review held on 11/27/07.
6/1/2008	Due to the expansion of the Westerville repair center into Mequon this project is on-hold until the move is complete.
12/1/2008	No tracking progress on this project has been started. The plan is to wait until the entire transfer is complete. The transfer is not expected to be complete until FY09Q1. Scott Quello is the new EHS coordinator and will now manage this project to completion.
12/19/2008	Project status reviewed the facility Management Review held on 12/19/08.
4/24/2009	The Westerville transfer is complete. The plan is to begin tracking to show the water reduction for 2 months beginning May 15th through July 15th, with the intent to report and close the metric on 7/31/09. Once the water usage is determined on the water reduction objective and target, we be able to calculate the reduction in natural gas based on the reduction in water use. We know that it takes 67.6 ft ³ to evaporate each gallon of water. The initial engineering calculations to support the conclusion to this metric were not realistic, so the decision was made to track the average number of units washed over the next 2 months. See water reduction O&T for more information.

Aspect and Impact Review	
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OTHER:

Objectives and Targets for the Environmental Program for the Richland Center, WI Facility, Fiscal Year 2009

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Category	Activity, Product, Service	Objective	Target	Responsible	Milestone/ Action Plan	Review Frequency	Accomplishment Status
(O&T 1) Hazardous Waste 4) Legal & Other (Waste Minimization) 6) Pollution Prevention 7) Continual Improvement	Spray paint booth, paint bake oven, paint storage	Eliminate hazardous waste [solvent] generated by the paint operation	(T1) Eliminate hazardous waste [paint solvent/ paint solvent rags associated with paint spray booth] by end of FY 2009 by replacing existing paint system with a powder coat system	Mike Polacek	(T1A) Review the feasibility of replacing the existing paint system with a powder coat paint system by 12-30-2008. (T1B) If project is feasible, enter E-par to request necessary capital dollars by 01-30-09. (T1C) Purchase and install new powder coat paint equipment by 9-30-09.	As required Per plan	(T1A)

Objectives and Targets for the Environmental Program for the Richland Center, WI Facility, Fiscal Year 2009

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Category	Activity, Product, Service	Objective	Target	Responsible	Milestone/ Action Plan	Review Frequency	Accomplishment Status
(O&T 2) Non-Hazardous Waste 1) Significant Environmental Impact 4) Legal & Other (Waste Minimization) 6) Pollution Prevention 7) Continual Improvement	Spray paint booth, paint bake oven, paint storage	Eliminate non-hazardous waste [sludge] generated by the paint operation	(T2) Eliminate non-hazardous waste [sludge] generated by the paint operation by end of FY 2009 by replacing existing paint system with a powder coat system	Michael Polacek	(T2A) Review the feasibility of replacing the existing paint system with a powder coat paint system by 12-30-2008. (T2B) If project is feasible, enter E-par to request necessary capital dollars by 02-28-09. (T2C) Purchase and install new powder coat paint equipment by 9-30-09.	As required Per plan	(T2A)

Objectives and Targets for the Environmental Program for the Richland Center, WI Facility, Fiscal Year 2009

Category	Activity, Product, Service	Objective	Target	Responsible	Milestone/ Action Plan	Review Frequency	Accomplishment Status
(O&T 3) 2) Technological Options 3) Financial or Business Requirement 7) Continual Improvement	Centerline	Reduce the number of paper copies of Centerline being printed	Reduce the number of printed copies of the Centerline by 15% by making electronic copies available on the RC webpage by June 30, 2009.	Brenda Anderson/Barry Delap	(T3A) Investigate the required format(s) necessary to upload the Centerline to the RC Homepage by 12/31/08. (T3B) Submit IT ticket to create necessary link on the webpage by 2/28/09. (T3C) Communicate to employees that the Centerline will be available for viewing on the RC webpage by 05/31/09. (T4D) Begin loading the Centerline to the RC webpage by 06/30/09.		
					RC Form No. 36-01A Rev. 05/2005		

RRC Form No. 36-01A Rev. 05/2005

Objectives and Targets for the Environmental Program for the Richland Center, WI Facility, Fiscal Year 2009

Category	Activity, Product, Service	Objective	Target	Responsible	Milestone/ Action Plan	Review Frequency	Accomplishment Status
(O & T 5) 2) Technological Options 3) Financial or Business Requirement 7) Continual Improvement	Paycheck Discrepancy Forms	Reduce the number of paper copies of paycheck discrepancy forms used	Reduce by 50% the number of paper copies of paycheck discrepancy forms used by June 30, 2009.	Brenda Anderson/Barry Delap	(T5A) Create a form fill paycheck discrepancy form that allows employees to electronically complete and turn in the form by December 31, 2008. (T5B) Work with IT department to link form with RC webpage by March 31, 2009. (T5C) Communicate new method for turning in paycheck discrepancy forms to supervisors and employees by May 29, 2009.	As required per plan.	
							RC Form No. 36-01A Rev. 05/2005

Objectives and Targets for the Environmental Program for the Richland Center, WI Facility, Fiscal Year 2009

Category	Activity, Product, Service	Objective	Target	Responsible	Milestone/ Action Plan	Review Frequency	Accomplishment Status
(O & T 7) 2) Technological Options 7) Continual Improvement	Carpet	Purchase eco-friendly replacement carpet	Purchase eco-friendly replacement carpet for upstairs conference rooms by 03/30/09.	Mike Polacek	(T7A) Investigate options for carpeting that uses recycled ingredients by 12/30/08. (T7B) Select best option for carpet that contains post-consumer recycled ingredients by 2/28/09. (T7C) Purchase and install eco-friendly carpet by 03/30/09.	As required per plan.	(T7A) 1. Investigated types and prices for eco-carpeting. (10/16/08) 2. Selected desired eco-carpeting and scheduled installation. (10/30/08) 3. Eco-carpeting from Shaw Industries installed in Cell View South and Manufacturing Information Center rooms. (11/14/08). Target Met

RC Form No. 36-01A Rev. 05/2005

Objectives and Targets for the Environmental Program for the Richland Center, WI Facility, Fiscal Year 2009

Category	Activity, Product, Service	Objective	Target	Responsible	Milestone/ Action Plan	Review Frequency	Accomplishment Status
(O & T 8) 1) Significant Environmental Impact 2) Technological Options 6) Pollution Prevention 7) Continual Improvement	Wooden pallets	Reduce the number of wooden pallets going to the landfill	Reduce the number of wooden pallets going to the landfill by 40% by 09/30/09.	Jake Stanek/Kathy Klingaman	(T8A) Investigate possible vendors who would be willing to take scrap skids to be recycled by 03/30/09. (T8B) Identify preferred vendor to take scrap skids by 05/29/08. (T8C) Implement skid recycling program by 7/31/09.	As required per plan.	

RC Form No. 36-01A Rev. 05/2005

Objectives and Targets for the Environmental Program for the Richland Center, WI Facility, Fiscal Year 2009

Category	Activity, Product, Service	Objective	Target	Responsible	Milestone/ Action Plan	Review Frequency	Accomplishment Status
(O & T 9) 1) Significant Environmental Impact 2) Technological Options 6) Pollution Prevention 7) Continual Improvement	Insta-Pak	Begin recycling Insta-Pak	Begin recycling 10% of Insta-Pak by 09/30/09.	Mike Polacek	(T9A) Investigate feasibility of replacing Priority Parts Lan Wrapper with Insta-Pak system by 03/30/09. (T9B) If feasible, enter purchase order for equipment by 05/29/09. (T9C) Change layout of Priority Parts area and install Insta-pak equipment by 7/30/09. (T9D) Collect used and/or scrap Insta-Pak and ship back to vendor for recycling by 09/30/09.	As required per plan.	
							RC Form No. 36-01A Rev. 05/2005

Objectives and Targets for the Environmental Program for the Richland Center, WI Facility, Fiscal Year 2009

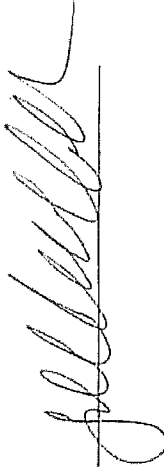
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Category	Activity, Product, Service	Objective	Target	Responsible	Milestone/ Action Plan	Review Frequency	Accomplishment Status
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Category:

- 1) Significant Environmental Impact
- 2) Technological Options
- 3) Financial or Business Requirement
- 4) Legal & Other Requirement
- 5) View of Interested Parties
- 6) Prevention of Pollution
- 7) Continual Improvement
- 8) Operational Requirements

Date: 11/29/08 Approved: _____



Appendix C: Rockwell Automation's Corporate Annual Report